



March 21, 2014

VIA CERTIFIED MAIL

Pick-N-Pull Auto Dismantlers
Managing Agent
6355 Pacific Street
Rocklin, California 95677

VIA UNITED STATES MAIL

Pick and Pull Auto Dismantling, Inc.
299 SW Clay, Suite 350
Portland, Oregon 97210

Schnitzer Steel Industries, Inc.
3200 NW Yeon Avenue
Portland, Oregon 97201

C T Corporation System
Registered Agent for Norprop, Inc.
818 W Seventh Street
Los Angeles, California 90017

C T Corporation System
Registered Agent for
Schnitzer Steel Industries, Inc.
818 W Seventh Street
Los Angeles, California 90017

Norprop, Inc.
3200 NW Yeon Avenue
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Pick-N-Pull
10850 Gold Center Drive, Suite 325
Rancho Cordova, California 95670

C T Corporation System
Registered Agent for
Pick and Pull Auto Dismantling, Inc.
818 W Seventh Street
Los Angeles, California 90017

Re: Notice of Violation and Intent to File Suit Under the Clean Water Act

To Whom It May Concern:

I am writing on behalf of California Sportfishing Protection Alliance ("CSPA") regarding violations of the Clean Water Act¹ and California's General Industrial Storm Water Permit²

¹ Federal Water Pollution Control Act, 33 U.S.C. §§ 1251 *et seq.*

occurring at the Pick and Pull Auto Dismantling, Inc. facility located at 6355 Pacific Street, Rocklin, California 95677 (hereinafter the "PNP Rocklin Facility" or "Facility"). The purpose of this letter is to put the owners and operators of the PNP Rocklin Facility on notice of the violations of the Storm Water Permit that have occurred, and continue to occur, at the Facility including, but not limited to, the discharges of polluted storm water from the Facility into local water bodies. Violations of the Storm Water Permit are violations of the Clean Water Act. As explained below, the owners and/or operators of the PNP Rocklin Facility are liable for violations of the Storm Water Permit and the Clean Water Act.

Section 505(b) of the Clean Water Act, 33 U.S.C. § 1365(b), requires that sixty (60) days prior to the initiation of a civil action under Section 505(a) of the Clean Water Act, 33 U.S.C. § 1365(a), a citizen must give notice of his/her intention to sue. Notice must be given to the alleged violator, the Administrator of the United States Environmental Protection Agency ("EPA"), the Regional Administrator of the EPA, the Executive Officer of the water pollution control agency in the State in which the violations occur, and, if the alleged violator is a corporation, the registered agent of the corporation. *See* 40 C.F.R. § 135.2. This letter is being sent to you as the PNP Rocklin Facility owners and/or operators, or as the registered agent for these entities. By this letter, issued pursuant to 33 U.S.C. §§ 1365(a) and (b) of the Clean Water Act, CSPA puts the PNP Rocklin Facility owners and/or operators on notice that after the expiration of sixty (60) days from the date of this letter, we intend to file an enforcement action in federal court against them for violations of the Storm Water Permit and the Clean Water Act.

I. Background.

A. California Sportfishing Protection Alliance.

CSPA is a 501(c)(3) non-profit public benefit conservation and research organization. CSPA was established in 1983 for the purpose of conserving, restoring, and enhancing the state's water quality, wildlife, fishery resources, aquatic ecosystems, and associated riparian habitats. CSPA accomplishes its mission by actively seeking federal, state, and local agency implementation of environmental regulations and statutes and routinely participates in administrative, legislative, and judicial proceedings. When necessary, CSPA directly initiates enforcement actions on behalf of itself and its members to protect public trust resources. CSPA's office is located at 3536 Rainier Avenue, Stockton, California 95204.

The owners and/or operators of the PNP Rocklin Facility have discharged, and continue to discharge, polluted storm water Dry Creek, which flows to Steelhead Creek, the Natomas East Main Drainage, and then to the Sacramento River (collectively "Receiving Waters"), in violation of the Clean Water Act and the Storm Water Permit. The PNP Rocklin Facility's discharges of polluted storm water degrade water quality and harm aquatic life in the Receiving Waters. Members of CSPA live, work, and/or recreate near the Receiving Waters. For example, CSPA members use and enjoy the Receiving Waters for fishing, boating, swimming, bird watching,

² National Pollution Discharge Elimination System ("NPDES") General Permit No. CAS000001 [State Water Resources Control Board] Water Quality Order No. 92-12-DWQ, as amended by Order No. 97-03-DWQ (hereinafter "Storm Water Permit").

picnicking, viewing wildlife, and engaging in scientific study. The unlawful discharge of pollutants from the PNP Rocklin Facility impairs each of these uses. As a result, CSPA's members' use and enjoyment of the Receiving Waters has been and continues to be adversely impacted. Thus, the interests of CSPA's members have been, are being, and will continue to be adversely affected by the failure of the PNP Rocklin Facility owners and/or operators to comply with the Storm Water Permit and the Clean Water Act.

B. The Owners and/or Operators of the PNP Rocklin Facility.

Based on information available to CSPA, below is a brief description of the PNP Rocklin Facility owners and/or operators covering the statutory period from March 21, 2009 to the present. CSPA refers to the entities identified below collectively as the "PNP Rocklin Facility Owners and/or Operators."

Pick-N-Pull Auto Dismantlers, a registered California General Partnership

Information available to CSPA indicates that Pick-N-Pull Auto Dismantlers, also referred to as "Pick-n-Pull," has been a registered California General Partnership since May 11, 2007. Information available to CSPA indicates that Pick-N-Pull Auto Dismantlers has been an owner of the PNP Rocklin Facility since at least March 21, 2009. Information available to CSPA indicates that Pick-N-Pull Auto Dismantlers has been an operator of the PNP Rocklin Facility since at least March 21, 2009. Information available to CSPA indicates that the general partners of Pick-N-Pull Auto Dismantlers are Norprop, Inc. and Pick and Pull Auto Dismantling, Inc.

Norprop, Inc.

Information available to CSPA indicates that Norprop, Inc. is an active corporation registered in both Oregon and California. Information available to CSPA indicates that Norprop, Inc. has been an owner of the PNP Rocklin Facility since at least March 21, 2009. Information available to CSPA indicates that Norprop, Inc. has been an operator of the PNP Rocklin Facility since at least March 21, 2009. Information available to CSPA indicates that Norprop, Inc. is a wholly owned subsidiary of Schnitzer Steel, Inc.

Pick and Pull Auto Dismantling, Inc.

Information available to CSPA indicates that Pick and Pull Auto Dismantling, Inc. is an active corporation registered in California. Information available to CSPA indicates that Pick and Pull Auto Dismantling, Inc. has been an owner of the PNP Rocklin Facility since at least March 21, 2009. Information available to CSPA indicates that Pick and Pull Auto Dismantling, Inc. has been an operator of the PNP Rocklin Facility since at least March 21, 2009. Information available to CSPA indicates that Pick and Pull Auto Dismantling, Inc. is a subsidiary of Norprop, Inc.

Schnitzer Steel Industries, Inc.

Information available to CSPA indicates that the PNP Rocklin Facility is just one of approximately 50 Pick-n-Pull locations across the United States and Canada. Information available to CSPA also indicates that all of the Pick-n-Pull locations were acquired by Schnitzer Steel Industries, Inc. on February 14, 2003, and became part of Schnitzer Steel Industries, Inc.'s

"Auto Parts Business unit." CSPA obtained the following information from the Pick-N-Pull website (www.picknpull.com): "Pick-n-Pull is a subsidiary of Schnitzer Steel Industries, Inc., a global leader in the metals recycling industry that has been in business for over a century. Although Pick-n-Pull and Schnitzer have worked together since 1989, Pick-n-Pull became a fully owned subsidiary of Schnitzer in 2003 as part of its Auto Parts Business unit." Further, CSPA obtained the following information from the Schnitzer Steel website (www.schnitzersteel.com): "Schnitzer's Auto Parts Business operates Pick-n-Pull, one of the nation's premier self-service used auto parts networks with 61 auto recycling facilities in 16 U.S. states and Western Canada dedicated to supplying customers with low-cost, quality used auto parts."

Information available to CSPA indicates that Schnitzer Steel Industries, Inc. is an active corporation registered in Oregon and California. Information available to CSPA indicates that Schnitzer Steel Industries, Inc. has been an owner of the PNP Rocklin Facility since at least March 21, 2009. Information available to CSPA indicates that Schnitzer Steel Industries, Inc. has been an operator of the PNP Rocklin Facility since at least March 21, 2009.

The Registered Agent for Norporp, Inc., Pick and Pull Auto Dismantling, Inc.. and Schnitzer Steel Industries, Inc. is CT Corporation System, located at 818 W Seventh Street, Los Angeles California 90017.

C. The PNP Rocklin Facility's Coverage Under the Storm Water Permit and Group Monitoring Plan.

A Notice of Intent ("NOI") to obtain Storm Water Permit coverage for the automobile dismantling operations at the PNP Rocklin Facility was submitted to the State Water Resources Control Board ("State Board") on March 30, 1991 ("1991 NOI"). The 1991 NOI lists the Owner/Operator as Pick-N-Pull Auto Dismantlers. The 1991 NOI states that the PNP Rocklin Facility is approximately six (6) acres in size, is 19% impervious, and lists the PNP Rocklin Facility's Standard Industrial Classification ("SIC") code as 5015 (Motor Vehicle Parts, Used). The State Board assigned the Facility WDID number 5S31I004286.

The 1991 NOI was revised on August 9, 1994, to include different people as the contacts for the owner/operator and facility location, and then revised again on June 23, 1995 to include different addresses for the owner and billing sections. A new NOI required for all existing permitted facilities was submitted on June 16, 1997 ("1997 NOI"). The 1997 NOI includes the same basic information as the 1991 NOI.

The PNP Rocklin Facility is one of approximately nineteen (19) Pick-N-Pull facilities in California that is a member of the ECM Services' California Auto Dismantlers Group Storm Monitoring Program ("GMP"). Information available to CSPA indicates that the PNP Rocklin Facility has been part of the GMP since at least 1994. The GMP includes specific monitoring requirements for the PNP Rocklin Facility Owners and/or Operators, discussed below in Section II.D.

Since at least the filing of the 2008/2009 Annual Report, the PNP Rocklin Facility Owners and/or Operators have identified the Facility Information and Facility Operator as "Pick N Pull Auto Dismantlers."³ The 2008/2009, 2009/2010, and 2011/2012 Annual Reports list the Facility Billing Information as "Pick N Pull Auto Dismantlers," but the 2012/2013 Annual Report lists the Facility Billing Information as "Schnitzer Steel Industries, Inc."

D. Storm Water Pollution and Its Impacts on the Sacramento-San Joaquin Delta Watershed.

With every significant rainfall event, millions of gallons of polluted rainwater, originating from industrial facilities such as the PNP Rocklin Facility, pour into storm drains and surface waters in California. The consensus among agencies and water quality specialists is that storm water pollution accounts for more than half of the total pollution entering surface waters each year. This discharge of pollutants, which includes discharges from industrial facilities, contributes to the impairment of downstream waters and aquatic dependent wildlife.

Polluted storm water discharges from auto dismantling and scrap metal yards can carry pollutants such as sediment (or total suspended solids ("TSS")); dust and particulates; petroleum hydrocarbons; and toxic metals such as mercury, nickel, cadmium, zinc, copper, iron, aluminum, and lead. Many of these pollutants are on the list of chemicals published by the State of California as known to cause cancer, birth defects, developmental, or reproductive harm. Polluted storm water discharges to surface waters pose carcinogenic and reproductive toxicity threats to the public and adversely affect the aquatic environment.

The California Regional Water Quality Control Board, Central Valley Region ("Regional Board") has issued its Water Quality Control Plan for the Sacramento and San Joaquin River Basins ("Basin Plan"). The Basin Plan identifies the "Beneficial Uses" of water bodies in the region. The Beneficial Uses for the Sacramento River, which receives polluted storm water discharges from the PNP Rocklin Facility, include: agriculture supply (AGR), municipal and domestic supply (MUN), water contact recreation (REC 1), non-contact water recreation (REC 2), cold freshwater habitat (COLD), warm freshwater habitat (WARM), wildlife habitat (WILD), migration of aquatic organisms (MIGR), navigation (NAV), and spawning, reproduction and development (SPWN). *See* Basin Plan at II-6.00, Table II-1.

A water body is impaired pursuant to section 303(d) of the Clean Water Act, 33 U.S.C. § 1313(d), when its Beneficial Uses are not being achieved due to the presence of one or more pollutants. According to the 2010 303(d) List of Impaired Water Bodies, the Natomas East Main Drainage, to which the PNP Rocklin Facility's storm water discharges flow, is impaired for pollutants including diazinon, mercury, and PCBs.⁴ Further, the portion of the Sacramento River that receives discharges from the PNP Rocklin Facility is impaired for pollutants including chlordane, DDT, dieldrin, mercury, PCBs, and unknown toxicity. Polluted storm water

³ The 2009/2010 Annual Report identifies the Facility Operator as "Pick-N-Pull."

⁴ 2010 Integrated Report – All Assessed Waters, available at:

http://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2010.shtml (last accessed on March 10, 2014).

discharges from industrial facilities, such as the PNP Rocklin Facility, contribute to the impairment of surface waters, including the Receiving Waters, and harm aquatic dependent wildlife.

E. The Industrial Activities at the PNP Rocklin Facility and Associated Pollutants.

Information available to CSPA indicates that the following industrial operations are conducted and are pollutant sources at the PNP Rocklin Facility: automobile dismantling; automobile parts storage and resale; used and salvaged automobile storage; scrap metal processing and storage; used battery collection, storage, and recycling; and vehicle and equipment maintenance. Information available to CSPA indicates that PNP Rocklin Facility Owners and/or Operators also generate and store hazardous waste such as waste oil, coolant, antifreeze, and gasoline.

Each of these activities or materials is a potential source of pollutants at the PNP Rocklin Facility. Information available to CSPA indicates that many, if not all, of the industrial operations and associated material storage at PNP Rocklin Facility are conducted outdoors without adequate cover or other effective best management practices ("BMPs") to prevent storm water exposure to pollutant sources, and without adequate secondary containment or other measures to prevent polluted storm water from discharging from the PNP Rocklin Facility.

The pollutants associated with operations at the PNP Rocklin Facility include, but are not limited to: sediment; dust and particulates; petroleum hydrocarbons; coolant; used oil filters; waste antifreeze; used oil; sulfuric acid; solvents; hydraulic fluids; diesel fuel; motor oil; and toxic metals such as mercury, zinc, copper, iron, aluminum, and lead.

Information available to CSPA also indicates that the pollutants and pollutant sources identified above have been and continue to be deposited in and around and/or tracked throughout the PNP Rocklin Facility. Further, individuals performing car repair and other activities deposit pollutants in the Facility parking lot, and where they are exposed to storm water flows. Pollutants accumulate at the storm water discharge points and drop inlets to the onsite storm drain system. They also accumulate at and on the driveways to Pacific Street, resulting in the discharge of pollutants at the driveways as well as tracking of sediment, dirt, oil and grease, metal particles and other pollutants off-site.

F. The PNP Rocklin Facility's Failure to Implement BMPs and Associated Discharges of Pollutants.

The PNP Rocklin Facility Owners and/or Operators report that there are two (2) discharge locations at the Facility. One of these discharge locations is located in a gravel production area near the Sales Building entrance. The second discharge location is located near the southern boundary of the Facility by the "De-Garbage Area."

There are at least two (3) additional points where storm water is discharged to underground storm drain system in the PNP Rocklin Facility parking lots along Pacific Street.

One is located in the eastern most parking area where customers park and perform car repairs. A second is located in the parking lot near middle of the PNP Rocklin Facility's frontage on Pacific Street. This second discharge location is located in the middle of an area where wrecked and dismantled vehicles are received and shipped. A third is located immediately to the west of the westernmost driveway from Pacific Street onto the PNP Rocklin Facility.

The driveways at the Facility access the Facility parking lot, as well as provide egress for shipping and receiving of wrecked and dismantled automobiles that are processed on site. The Facility parking lot is heavily soiled with automobile fluids, contains broken and wrecked automobile parts, and is used for storage of wrecked and dismantled vehicles. Storm water exposed to pollutants in the Facility parking lot and egress points is discharged from the Facility driveways. There are at least three (3) driveways from which storm water is discharged at the PNP Rocklin Facility.

The PNP Rocklin Facility Owners and/or Operators have not properly developed and/or implemented the required BMPs to address pollutant sources, prevent the exposure of pollutants to storm water, and prevent the subsequent discharge of polluted storm water from the PNP Rocklin Facility during rain events. Consequently, during rain events, storm water carries pollutants from the PNP Rocklin Facility's uncovered and exposed areas of industrial activity into the Receiving Waters. These discharges negatively impact the Receiving Waters and CSPA's members' use and enjoyment of the Receiving Waters.

The PNP Rocklin Facility Owners' and/or Operators' failure to develop and/or implement adequate BMPs is documented by notices and inspection reports issued by the Regional Board. Specifically, the Regional Board has issued at least one Deficient BMP Implementation Letter, two Notices of Violation, and multiple inspection reports to the PNP Rocklin Facility Owners and/or Operators notifying them of their Storm Water Permit violations and required corrective actions. For example, on March 30, 2007, the Regional Board issued a Notice of Violation to the PNP Rocklin Facility Owners and/or Operators for failing to submit their storm water sampling results and then, upon receiving the results, notified them that the exceedances of Benchmark Levels⁵ in their storm water samples indicated that the Facility's BMPs were inadequate. On October 23, 2009, the Regional Board sent the PNP Rocklin Facility Owners and/or Operators a Deficient BMP Implementation Letter to notifying them that their sample results indicated levels of pollutants in storm water discharges above Benchmark Levels. Then in January 2010, a contractor representing the EPA inspected the PNP Rocklin Facility. Based on the results of this inspection, the Regional Board issued a Notice of Violation for the Facility and produced an inspection report noting the continuing Benchmark Level exceedances and the PNP Rocklin Facility Owners' and/or Operators' failure to implement effective BMPs. The Regional Board inspected the Facility again in August 2010 in response to the Benchmark Level exceedances reported in the Facility's 2009-2010 Annual Report and produced another inspection report describing inadequate BMPs at the Facility.

⁵ See United States Environmental Protection Agency (EPA) National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP), as modified effective May 27, 2009.

The PNP Rocklin Facility Owners and/or Operators responded to the Regional Board Deficient BMP Implementation Letter and inspection reports with an Action Plan and other proposals presumably intended to improve the quality of storm water discharging from the Facility. For example, information available to CSPA indicates that the PNP Rocklin Facility Owners and/or Operators planned to install a new oil/water separator and media filtration system in 2011 at the Facility and increase maintenance and cleaning of the clarifiers, storm water interceptors, and filter inserts. However, storm water collected by the PNP Rocklin Facility Owners and/or Operators during the Wet Seasons since the August 2010 inspection continue to contain concentrations of pollutants above Benchmark Levels and applicable water quality standards for at least the following pollutants: copper, zinc, oil and grease, total suspended solids, lead, and electrical conductivity. *See* Exhibit A. These sample results containing high pollutant concentrations, plus the evidence of the PNP Rocklin Facility Owners' and/or Operators' failure to develop and/or implement an adequate Storm Water Pollution Prevention Plan ("SWPPP") and Monitoring and Reporting Program ("M&RP"), indicate that the required corrective actions have not been taken and the Facility continues to operate in violation of the Storm Water Permit.

II. Violations of the Clean Water Act and the Storm Water Permit.

In California, any person who discharges storm water associated with industrial activity must comply with the terms of the Storm Water Permit in order to lawfully discharge pollutants. *See* 33 U.S.C. §§ 1311(a), 1342; 40 C.F.R. § 122.26(c)(1); *see also* Storm Water Permit, Fact Sheet at VII.

A. Discharges of Polluted Storm Water from the PNP Rocklin Facility in Violation of Effluent Limitation B(3) of the Storm Water Permit.

Effluent Limitation B(3) of the Storm Water Permit requires dischargers to reduce or prevent pollutants associated with industrial activity in storm water discharges through implementation of BMPs that achieve best available technology economically achievable ("BAT") for toxic pollutants⁶ and best conventional pollutant control technology ("BCT") for conventional pollutants.⁷ Benchmark Levels are relevant and objective standards to evaluate whether a permittee's BMPs achieve compliance with BAT/BCT standards as required by Effluent Limitation B(3) of the Storm Water Permit.⁸

Sampling at the PNP Rocklin Facility demonstrates that storm water discharges contain concentrations of pollutants above Benchmark Levels. *See* Exhibit A (table listing samples collected at the PNP Rocklin Facility exceeding Benchmark Levels). The repeated and significant exceedances of Benchmark Levels demonstrate that the PNP Rocklin Facility Owners and/or Operators have not implemented BMPs at the PNP Rocklin Facility that achieve

⁶ Toxic pollutants are listed at 40 C.F.R. § 401.15 and include copper, lead, and zinc, among others.

⁷ Conventional pollutants are listed at 40 C.F.R. § 401.16 and include biological oxygen demand, total suspended solids, oil and grease, pH, and fecal coliform.

⁸ *See* EPA Storm Water Multi-Sector Permit (2008), Fact Sheet, p. 106; *see also*, EPA Storm Water Multi-Sector Permit, 65 Federal Register 64839 (2000).

compliance with the BAT/BCT standards. In addition, the files at the Regional Board demonstrate that the PNP Rocklin Facility Owners and/or Operators have been notified on more than one occasion that the storm water discharging from the Facility contains excess levels of pollutants, and that the BMPs at the Facility fail to achieve compliance with the BAT/BCT standard. Despite these notices from the Regional Board, the PNP Rocklin Facility Owners and/or Operators have failed and continue to fail to develop and/or implement BMPs to prevent the exposure of pollutants to storm water and to prevent discharges of polluted storm water from the PNP Rocklin Facility, in violation of Effluent Limitation B(3) of the Storm Water Permit.

Information available to CSPA indicates that the PNP Rocklin Facility Owners and/or Operators violate Effluent Limitation B(3) of the Storm Water Permit for failing to develop and/or implement BMPs that achieve BAT/BCT each time storm water is discharged from the PNP Rocklin Facility. *See e.g.*, Exhibit B (setting forth dates of rain events resulting in a discharge at the Facility).⁹ These discharge violations are ongoing and will continue each day the PNP Rocklin Facility Owners and/or Operators discharge polluted storm water without developing and/or implementing BMPs that achieve compliance with the BAT/BCT standards. CSPA will update the number and dates of violation when additional information and data becomes available. Each time the PNP Rocklin Facility Owners and/or Operators discharge polluted storm water in violation of Effluent Limitation B(3) of the Storm Water Permit is a separate and distinct violation of the Storm Water Permit and Section 301(a) of the Clean Water Act, 33 U.S.C. §1311(a). The PNP Rocklin Facility Owners and/or Operators are subject to civil penalties for all violations of the Clean Water Act occurring since March 21, 2009.

B. Discharges of Polluted Storm Water in Violation of Receiving Water Limitations C(1) and C(2) of the Storm Water Permit.

Receiving Water Limitation C(1) of the Storm Water Permit prohibits storm water discharges and authorized non-stormwater discharges to surface water or ground water that adversely impact human health or the environment. Discharges that contain pollutants in concentrations that exceed levels known to adversely impact aquatic species and the environment constitute violations of Receiving Water Limitation C(1) of the Storm Water Permit and the Clean Water Act. Receiving Water Limitation C(2) of the Storm Water Permit prohibits storm water discharges and authorized non-stormwater discharges that cause or contribute to an exceedance of an applicable water quality standard ("WQS").¹⁰ Discharges that contain pollutants in excess of an applicable WQS violate Receiving Water Limitation C(2) of the Storm Water Permit and the Clean Water Act.

⁹ Exhibit B sets forth dates of significant rain events as measured at the Sacramento Metro Airport rain gauge from March 21, 2009 to March 21, 2014. A significant rain event is defined by EPA as a rainfall event generating 0.1 inches or more of rainfall, which generally results in measurable discharges at a typical industrial facility.

¹⁰ As explained above in Section I.D, the Basin Plan designates Beneficial Uses for the Receiving Waters. Water quality standards are pollutant concentration levels determined by the state or federal agencies to be protective of designated Beneficial Uses. Discharges above water quality standards contribute to the impairment of the Receiving Waters' Beneficial Uses. Applicable water quality standards include, among others, the Criteria for Priority Toxic Pollutants in the State of California, 40 C.F.R. § 131.38 ("CTR"), and the water quality objectives in the Basin Plan.

As explained above in Section I.D, the 2010 303(d) List of Impaired Water Bodies lists the Natomas East Main Drainage and Sacramento River as impaired for multiple pollutants. Information available to CSPA indicates that the PNP Rocklin Facility's storm water discharges contain elevated concentrations of pollutants, including but not limited to lead, copper, zinc, cadmium, mercury, and aluminum, which can be acutely toxic and/or have sub-lethal impacts on the avian and aquatic wildlife in the Receiving Waters. Discharges of elevated concentrations of pollutants in the storm water from the PNP Rocklin Facility also adversely impact human health. These harmful discharges from the PNP Rocklin Facility are violations of Receiving Water Limitation C(1).

The PNP Rocklin Facility storm water discharges also contain concentrations of pollutants that cause or contribute to violations of applicable WQSs. *See e.g.* Exhibit A (table listing samples collected at the PNP Rocklin Facility exceeding applicable WQSs). Storm water discharges from the PNP Rocklin Facility that cause or contribute to exceedances of WQSs are violations of Receiving Water Limitation C(2).

Information available to CSPA indicates that the storm water discharges from the PNP Rocklin Facility violate Receiving Water Limitations C(1) and/or C(2) each time storm water is discharged from the Facility. These violations are ongoing, and will continue each time contaminated storm water is discharged in violation of the Receiving Water Limitation C(1) and/or C(2) of the Storm Water Permit. Each time discharges of storm water from the Facility adversely impact human health or the environment is a separate and distinct violation of Receiving Water Limitation C(1) of the Storm Water Permit and Section 301(a) of the Clean Water Act, 33 U.S.C. §1311(a). Each time discharges of storm water from the PNP Rocklin Facility cause or contribute to a violation of an applicable WQS is a separate and distinct violation of Receiving Water Limitation C(2) of the Storm Water Permit and Section 301(a) of the Clean Water Act, 33 U.S.C. §1311(a). CSPA will update the number and dates of violation when additional information becomes available. The PNP Rocklin Facility Owners and/or Operators are subject to civil penalties for all violations of the Clean Water Act occurring since March 21, 2009.

C. Failure to Develop, Implement, and/or Revise an Adequate Storm Water Pollution Prevention Plan.

Section A(1) and Provision E(2) of the Storm Water Permit require dischargers to have developed and implemented a SWPPP by October 1, 1992, or prior to beginning industrial activities, that meets all of the requirements of the Storm Water Permit. The objective of the SWPPP requirement is to identify and evaluate sources of pollutants associated with industrial activities that may affect the quality of storm water discharges from the PNP Rocklin Facility, and to implement site-specific BMPs to reduce or prevent pollutants associated with industrial activities in storm water discharges. *See* Storm Water Permit, Section A(2). These BMPs must achieve compliance with the Storm Water Permit's Effluent Limitations and Receiving Water Limitations. To ensure compliance with the Storm Water Permit, the SWPPP must be evaluated on an annual basis pursuant to the requirements of Section A(9), and must be revised as necessary to ensure compliance with the Storm Water Permit. *Id.*, Sections A(9) and (10).

Sections A(3) – A(10) of the Storm Water Permit set forth the requirements for a SWPPP. Among other requirements, the SWPPP must include: a site map showing the facility boundaries, storm water drainage areas with flow patterns, nearby water bodies, the location of the storm water collection, conveyance and discharge system, structural control measures, areas of actual and potential pollutant contact, and areas of industrial activity (*see* Storm Water Permit, Section A(4)); a list of significant materials handled and stored at the site (*see* Storm Water Permit, Section A(5)); a description of potential pollutant sources, including industrial processes, material handling and storage areas, dust and particulate generating activities, significant spills and leaks, non-stormwater discharges and their sources, and locations where soil erosion may occur (*see* Storm Water Permit, Section A(6)). Sections A(7) and A(8) of the Storm Water Permit require an assessment of potential pollutant sources at the facility and a description of the BMPs to be implemented at the facility that will reduce or prevent pollutants in storm water discharges and authorized non-stormwater discharges, including structural BMPs where non-structural BMPs are not effective.

Information available to CSPA indicates that the PNP Rocklin Facility Owners and/or Operators have been conducting operations at the Facility with an inadequately developed and/or implemented SWPPP. For example, the PNP Rocklin Facility Owners and/or Operators failed to create a site map that includes all the information required by Section A(4) of the Storm Water Permit. The PNP Rocklin Facility Owners and/or Operators have also failed and continue to fail to develop and/or implement a SWPPP that contains BMPs to prevent the exposure of pollutant sources to storm water and the subsequent discharge of polluted storm water from the Facility, plus the associated descriptions, as required by the Storm Water Permit. The SWPPP inadequacies are documented by the continuous and ongoing discharge of storm water containing pollutant levels in violation of the Storm Water Permit. *See, e.g.,* Exhibit A. The Regional Board has also notified the PNP Rocklin Facility Owners and/or Operators that the levels of pollutants in their storm water discharges require them to improve BMPs in order to comply with the Storm Water Permit, which includes revising the Facility's SWPPP to include adequate BMPs. However, the PNP Rocklin Facility Owners and/or Operators continue to respond to the Regional Board notices with inadequate BMP modifications.

The PNP Rocklin Facility Owners and/or Operators have also not revised the SWPPP as required by the Storm Water Permit. For example, even though the Regional Board has notified the PNP Rocklin Facility Owners and/or Operators four times that their sampling results indicate the Facility's BMPs are inadequate and thus their SWPPP is also insufficient or incomplete, sampling results collected at the Facility after these notices continue to indicate that the BMPs are inadequate, as demonstrated by annual Benchmark Level and WQS exceedences. Further, the PNP Rocklin Facility Owners and/or Operators have never developed or revised a SWPPP that contains all of the site-specific information required by the Storm Water Permit.

The PNP Rocklin Facility Owners and/or Operators have failed to adequately develop, implement, and/or revise a SWPPP, in violation of Section A and Provision E(2) of the Storm Water Permit. Every day the PNP Rocklin Facility operates with an inadequately developed, implemented, and/or properly revised SWPPP is a separate and distinct violation of the Storm

Water Permit and the Clean Water Act. The PNP Rocklin Facility Owners and/or Operators have been in daily and continuous violation of the Storm Water Permit's SWPPP requirements since at least March 21, 2009. These violations are ongoing, and CSPA will include additional violations when information becomes available. The PNP Rocklin Facility Owners and/or Operators are subject to civil penalties for all violations of the Clean Water Act occurring since March 21, 2009.

D. Failure to Develop, Implement, and/or Revise an Adequate Monitoring and Reporting Program.

Section B(1) and Provision E(3) of the Storm Water Permit require facility operators to develop and implement an adequate M&RP by October 1, 1992, or prior to the commencement of industrial activities at a facility, that meets all of the requirements of the Storm Water Permit. The primary objective of the M&RP is to detect and measure the concentrations of pollutants in a facility's discharge to ensure compliance with the Storm Water Permit's Discharge Prohibitions, Effluent Limitations, and Receiving Water Limitations. *See* Storm Water Permit, Section B(2). The M&RP must therefore ensure that BMPs are effectively reducing and/or eliminating pollutants at the facility, and must be evaluated and revised whenever appropriate to ensure compliance with the Storm Water Permit. *Id.*

Sections B(3) – B(16) of the Storm Water Permit set forth the M&RP requirements. Specifically, Section B(3) requires dischargers to conduct quarterly visual observations of all drainage areas within their facility for the presence of authorized and unauthorized non-stormwater discharges. Section B(4) requires dischargers to conduct visual observations of storm water discharges from one storm event per month during the Wet Season (defined by the Storm Water Permit as October 1 – May 30). Sections B(3) and B(4) further require dischargers to document the presence of any floating or suspended material, oil and grease, discolorations, turbidity, odor, and the source of any pollutants. Dischargers must maintain records of observations, observation dates, locations observed, and responses taken to eliminate unauthorized non-stormwater discharges and to reduce or prevent pollutants from contacting non-stormwater and storm water discharges. *See* Storm Water Permit, Sections B(3) and B(4). Dischargers must also revise the SWPPP in response to these observations to ensure that BMPs are effectively reducing and/or eliminating pollutants at the facility. *Id.*, Section B(4).

Sections B(5) and B(7) of the Storm Water Permit require dischargers to visually observe and collect samples of storm water from all locations where storm water is discharged. Under Section B(5) of the Storm Water Permit, the facility owners and/or operators are required to collect storm water samples from each discharge location at their facility during the Wet Season. Storm water samples must be analyzed for total suspended solids ("TSS"), pH, specific conductance, total organic carbon or oil and grease, and other pollutants that are likely to be present in the facility's discharges in significant quantities. *See* Storm Water Permit, Section B(5)(c). The PNP Rocklin Facility, as an automobile salvage yard classified as SIC Code 5015, must also analyze storm water samples for iron, lead, and aluminum, or as required by the Regional Board. *Id.*; *see also* Storm Water Permit, Table D, Sector N.

For facility owners and/or operators participating in a GMP, all of the above M&RP requirements apply, including the sample collection requirements. *See* Storm Water Permit, Sections B(15)(b), (f), and (h). Each GMP participant must collect and analyze samples from at least two storm events over the five-year period of the Storm Water Permit, or more depending on the requirements of the site-specific GMP. *See* Storm Water Permit, Section B(15)(b). GMP participants must comply with all other monitoring program and reporting requirements of the Storm Water Permit during all Wet Seasons. Storm Water Permit, Section B(15)(h).

Information available to CSPA, including review of Annual Reports, indicates that the PNP Rocklin Facility Owners and/or Operators have been conducting operations at the Facility with an inadequately developed and/or implemented M&RP. For example, the PNP Rocklin Facility Owners and/or Operators did not provide the date, time, or location of their visual observations of storm water discharges during many months that they reported it rained, nor did they document the presence of any materials or odors in the discharges or their responses to observed pollutants, in violation of Section B(4) of the Storm Water Permit. Moreover, the PNP Rocklin Facility Owners and/or Operators failed to collect a sample during the first storm event of each Wet Season without explanation and the samples that are collected are not always collected during the first hour of discharge, in violation of Sections B(5) of the Storm Water Permit.

The PNP Rocklin Facility Owners and/or Operators have also failed to analyze samples for all parameters required by the Storm Water Permit. The PNP Rocklin Facility Owners and/or Operators have not analyzed storm water samples from the Facility for aluminum, a Table D requirement for all facilities classified as SIC code 5015,¹¹ or for pollutants that are likely to be present in storm water discharges in significant quantities. *See* Storm Water Permit, Sections B(5)(c)(ii)-(iii). During the 2009/2010 Wet Season, storm water discharges from the PNP Rocklin Facility contained levels of cadmium above Benchmark Levels, and indeed the GMP required the PNP Rocklin Facility Owners and/or Operators to analyze their storm water samples for this parameter. However, the PNP Rocklin Facility Owners and/or Operators stopped this analysis after the 2009/2010 Wet Season without explanation, despite sample results indicating high levels of cadmium in the Facility's storm water discharges and no evidence that cadmium was no longer present in the Facility's discharges in significant quantities. These failures to comply with the Storm Water Permit's requirements demonstrate the inadequacies of the M&RP and the failure to properly implement the M&RP at the Facility.

Additionally, the PNP Rocklin Facility Owners and/or Operators have not complied with the Storm Water Permit requirements to collect and analyze storm water samples from all discharge locations. During the 2009/2010 and 2010/2011 Wet Seasons, the PNP Rocklin Facility Owners and/or Operators analyzed a combined sample from the two discharge locations at the Facility. However, they did not include any documentation in their Annual Reports that they determined that the Facility drainage areas were substantially identical, as required by the

¹¹ Information available to CSPA indicates that the PNP Rocklin Facility Owners and/or Operators were notified that their excuse for failing to analyze samples for aluminum - which was that the sampling plan for the GMP does not specifically include aluminum, and the plan was approved by the State Board - is not appropriate, and that the group sampling plan must be modified accordingly.

Storm Water Permit. The PNP Rocklin Facility Owners and/or Operators did analyze samples from each discharge location individually after the Regional Board instructed them to stop analyzing composite samples until their storm water discharges were below Benchmark Levels, but in the 2012/2013 Wet Season they again only analyzed one combined sample from both discharge points, even though all prior samples continued to exceed Benchmark Levels. Improperly taking a combined sample and not properly documenting the reasons for doing so in the Annual Report is a violation of Section B(7)(d) of the Storm Water Permit.

Finally, the PNP Rocklin Facility Owners and/or Operators have not revised the M&RP as required by the Storm Water Permit. For example, in its May 6, 2010 Notice of Violation, the Regional Board required the PNP Rocklin Facility Owners and/or Operators to submit a revised M&RP by June 3, 2010, that was site-specific and included adequate BMPs for the Facility. Instead, the PNP Rocklin Facility submitted a letter stating that the M&RP was site-specific and including the table of contents for the M&RP. Not only did the PNP Rocklin Facility Owners and/or Operators not revise the M&RP for the Facility before responding to the Regional Board, but the table of contents that was submitted appears to provide only further evidence that the M&RP is not site-specific as required by Section B(15) of the Storm Water Permit.

The PNP Rocklin Facility Owners' and/or Operators' failure to conduct sampling, monitoring, and reporting as required by the Storm Water Permit demonstrates that they have failed to develop, implement, and/or revise an M&RP that complies with the requirements of Section B and Provision E(3) of the Storm Water Permit. Every day that the PNP Rocklin Facility Owners and/or Operators conduct operations in violation of the specific monitoring and reporting requirements of the Storm Water Permit, or with an inadequately developed and/or implemented M&RP, is a separate and distinct violation of the Storm Water Permit and the Clean Water Act. The PNP Rocklin Facility Owners and/or Operators have been in daily and continuous violation of the Storm Water Permit's M&RP requirements every day since at least March 21, 2009. These violations are ongoing, and CSPA will include additional violations when information becomes available. The PNP Rocklin Facility Owners and/or Operators are subject to civil penalties for all violations of the Clean Water Act occurring since March 21, 2009.

E. Failure to Comply with the Storm Water Permit's Reporting Requirements.

Section B(14) of the Storm Water Permit requires a permittee to submit an Annual Report to the Regional Board by July 1 of each year. Section B(14) requires that the Annual Report include a summary of visual observations and sampling results, an evaluation of the visual observation and sampling results, the laboratory reports of sample analysis, the Annual Comprehensive Site Compliance Evaluation Report ("ACSCE Report"), an explanation of why a permittee did not implement any activities required by the Storm Water Permit, and other information specified in Section B(14).

Since at least the 2008/2009 Annual Report, the PNP Rocklin Facility Owners and/or Operators have failed to submit Annual Reports that comply with the Storm Water Permit reporting requirements, including filing incomplete Annual Reports that do not provide the information required by the Storm Water Permit. For example, each Annual Report provides

visual observation records for the calendar year, not the Wet Season. As a result, none of the Annual Reports include records of the PNP Rocklin Facility Owners' and/or Operators' visual observations from October, November, or December of the relevant Wet Season, nor does the Annual Report provide an explanation for this failure to properly report visual observations. These are violations of Section B(14) of the Storm Water Permit. Moreover, each Annual Report must contain an ACSCE Report that includes a list of information specified in Section A(9) of the Storm Water Permit. The PNP Rocklin Facility Owners and/or Operators have not submitted this Report since at least the 2008/2009 Wet Season.

Additionally, each Annual Report for the PNP Rocklin Facility includes a certification from the PNP Rocklin Facility Owners and/or Operators that the Facility is in compliance with the Storm Water Permit. However, information available to CSPA, including a review of the Regional Board's files and the PNP Rocklin Facility storm water sampling data, indicates that these certifications by the PNP Rocklin Facility Owners and/or Operators are erroneous. The PNP Rocklin Facility Owners and/or Operators have not developed and/or implemented adequate BMPs or properly revised the SWPPP or M&RP, resulting in the ongoing discharge of storm water containing pollutant levels in violation of the Storm Water Permit limitations. Moreover, the Annual Reports for the PNP Rocklin Facility consistently exhibit the PNP Rocklin Facility Owners' and/or Operators' Storm Water Permit violations, thereby demonstrating the inadequacies of the M&RP and/or the failure to properly implement the M&RP at the Facility. Despite these self-reported violations, the PNP Rocklin Facility Owners and/or Operators improperly certified that the PNP Rocklin Facility is in compliance with the Storm Water Permit. See e.g. 2011/2012 Annual Report, Section J: *ACSCE Certification*.

Information available to CSPA indicates that the PNP Rocklin Facility Owners and/or Operators have submitted incomplete and/or incorrect Annual Reports that fail to comply with the Storm Water Permit. As such, the PNP Rocklin Facility Owners and/or Operators are in daily violation of the Storm Water Permit. Every day the PNP Rocklin Facility Owners and/or Operators conduct operations at the Facility without reporting as required by the Storm Water Permit is a separate and distinct violation of the Storm Water Permit and Section 301(a) of the Clean Water Act, 33 U.S.C. §1311(a). The PNP Rocklin Facility Owners and/or Operators have been in daily and continuous violation of the Storm Water Permit's reporting requirements every day since at least March 21, 2009. These violations are ongoing. The PNP Rocklin Facility Owners and/or Operators are subject to civil penalties for all violations of the Clean Water Act occurring since March 21, 2009.

III. Relief and Penalties Sought for Violations of the Clean Water Act.

Pursuant to Section 309(d) of the Clean Water Act, 33 U.S.C. § 1319(d), and the Adjustment of Civil Monetary Penalties for Inflation, 40 C.F.R. §19.4, each separate violation of the Clean Water Act subjects the violator to a penalty for all violations occurring during the period commencing five years prior to the date of a notice of intent to file suit letter. These provisions of law authorize civil penalties of up to \$37,500 per day per violation for all Clean Water Act violations. In addition to civil penalties, CSPA will seek injunctive relief preventing further violations of the Clean Water Act pursuant to Sections 505(a) and (d), 33 U.S.C.

§1365(a) and (d), declaratory relief, and such other relief as permitted by law. Lastly, pursuant to Section 505(d) of the Clean Water Act, 33 U.S.C. § 1365(d), CSPA will seek to recover its costs, including attorneys' and experts' fees, associated with this enforcement action.

IV. Conclusion

Upon expiration of the 60-day notice period, CSPA will file a citizen suit under Section 505(a) of the Clean Water Act for the PNP Rocklin Facility Owners' and/or Operators' violations of the Storm Water Permit. During the 60-day notice period, however, CSPA is willing to discuss effective remedies for the violations noted in this letter. If you wish to pursue such discussions please contact CSPA. Please direct all communications to CSPA's legal counsel:

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Sincerely,



Bill Jennings, Executive Director
California Sportfishing Protection Alliance

ADDITIONAL SERVICE LIST

FEDERAL AGENCIES

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Central Valley Regional Water Quality Control Board
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Exhibit A

Date/time of sample collection	Parameter	Sample Location	Result	Units	Benchmark	Magnitude of Benchmark Exceedance
2009/2010 WET SEASON						
10/19/09 12:55	Lead Total	Composite	0.23	mg/L	0.069	3.33
10/19/09 12:55	Zinc Total	Composite	0.74	mg/L	0.11	6.73
10/19/09 12:55	Total Oil and Grease	Composite	37.00	mg/L	15.00	2.47
10/19/09 12:55	Copper Total	Composite	0.13	mg/L	0.0123	10.57
3/12/10 13:45	Total Suspended Solids (TSS)	Composite	400.00	mg/L	100.00	4.00
3/12/10 13:45	Lead Total	Composite	0.41	mg/L	0.069	5.94
3/12/10 13:45	Copper Total	Composite	0.13	mg/L	0.0123	10.57
3/12/10 13:45	Cadmium	Composite	0.0091	mg/L	0.0018	5.06
3/12/10 13:45	Zinc Total	Composite	1.20	mg/L	0.11	10.91
2010/2011 WET SEASON						
3/18/11 13:50	Copper Total	West of Main Parking Lot	0.046	mg/L	0.0123	3.74
3/18/11 13:50	Zinc Total	West of Main Parking Lot	0.23	mg/L	0.11	2.09
3/18/11 13:50	Total Oil and Grease	West of Back Gate	16.00	mg/L	15.00	1.07
3/18/11 13:50	Total Suspended Solids (TSS)	West of Back Gate	229.00	mg/L	100.00	2.29
3/18/11 13:50	Copper Total	West of Back Gate	0.13	mg/L	0.0123	10.57
3/18/11 13:50	Lead Total	West of Back Gate	0.18	mg/L	0.069	2.61
3/18/11 13:50	Zinc Total	West of Back Gate	0.65	mg/L	0.11	5.91
2011/2012 WET SEASON						
1/20/11 8:03	Electrical Conductivity @ 25 Deg. C	Production Gate (#2)	592.00	micromhos/cm	200.00	2.96
1/20/11 8:03	Copper Total	Production Gate (#2)	0.088	mg/L	0.0123	7.15
1/20/11 8:15	Electrical Conductivity @ 25 Deg. C	Planter DP (Outfall #1)	810.00	micromhos/cm	200.00	4.05

Date/time of sample collection	Parameter	Sample Location	Result	Units	Benchmark	Magnitude of Benchmark Exceedance
1/20/11 8:15	Copper Total	Planter DP (Outfall #1)	0.027	mg/L	0.0123	2.20
2012/2013 WET SEASON						
11/17/12 15:12	Electrical Conductivity @ 25 Deg. C	not specified	245.00	umhos/cm	200.00	1.23
11/17/12 15:12	Copper Total	not specified	0.093	mg/L	0.0123	7.56
11/17/12 15:12	Zinc Total	not specified	0.44	mg/L	0.11	4.00

Exhibit B

**All Wet Season Rain Events With Discharge Over 0.1 Inches Since March 21, 2009
Sacramento Metro Airport Rain Gauge**

Date	Day of the Week	Daily Precip
4/7/09	Tuesday	0.32
4/8/09	Wednesday	0.15
5/1/09	Friday	0.55
5/2/09	Saturday	0.16
10/13/09	Tuesday	1.97
10/14/09	Wednesday	0.16
10/19/09	Monday	0.23
11/17/09	Tuesday	0.16
11/20/09	Friday	0.28
12/6/09	Sunday	0.16
12/7/09	Monday	0.2
12/10/09	Thursday	0.16
12/11/09	Friday	0.82
12/12/09	Saturday	0.59
12/13/09	Sunday	0.16
12/16/09	Wednesday	0.2
12/21/09	Monday	0.12
1/13/10	Wednesday	0.28
1/18/10	Monday	0.15
1/19/10	Tuesday	1.26
1/20/10	Wednesday	0.95
1/21/10	Thursday	0.63
1/23/10	Saturday	0.23
1/25/10	Monday	0.28
2/4/10	Thursday	0.51
2/9/10	Tuesday	0.11
2/23/10	Tuesday	0.51
2/26/10	Friday	0.36
2/27/10	Saturday	0.47
3/2/10	Tuesday	0.16
3/3/10	Wednesday	0.75
3/12/10	Friday	0.27
4/4/10	Sunday	0.59
4/11/10	Sunday	0.59
4/12/10	Monday	0.75
4/20/10	Tuesday	0.47

4/27/10	Tuesday	0.12
5/10/10	Monday	0.16
5/25/10	Tuesday	0.16
5/27/10	Thursday	0.12
10/23/10	Saturday	0.16
10/24/10	Sunday	0.47
11/7/10	Sunday	0.39
11/19/10	Friday	0.55
11/20/10	Saturday	0.83
11/27/10	Saturday	0.24
12/2/10	Thursday	0.11
12/4/10	Saturday	0.16
12/5/10	Sunday	0.87
12/8/10	Wednesday	0.16
12/17/10	Friday	0.55
12/18/10	Saturday	0.63
12/19/10	Sunday	1.26
12/20/10	Monday	0.2
12/22/10	Wednesday	0.47
12/25/10	Saturday	0.71
12/28/10	Tuesday	0.2
1/1/11	Saturday	0.27
1/2/11	Sunday	0.47
1/30/11	Sunday	0.27
2/16/11	Wednesday	0.44
2/17/11	Thursday	0.78
2/18/11	Friday	0.55
2/19/11	Saturday	0.12
2/24/11	Thursday	0.55
2/25/11	Friday	0.64
3/6/11	Sunday	0.48
3/13/11	Sunday	0.35
3/14/11	Monday	0.2
3/15/11	Tuesday	0.63
3/18/11	Friday	0.59
3/19/11	Saturday	0.43
3/20/11	Sunday	0.67
3/23/11	Wednesday	0.23
3/24/11	Thursday	0.99
3/26/11	Saturday	0.27
5/15/11	Sunday	0.12

5/16/11	Monday	0.32
5/17/11	Tuesday	0.27
5/18/11	Wednesday	0.16
5/25/11	Wednesday	0.2
10/5/11	Wednesday	0.27
10/10/11	Monday	0.63
11/5/11	Saturday	0.24
11/20/11	Sunday	0.12
11/24/11	Thursday	0.15
1/19/12	Thursday	0.2
1/20/12	Friday	1.06
1/22/12	Sunday	0.24
1/23/12	Monday	0.71
2/7/12	Tuesday	0.12
2/29/12	Wednesday	0.31
3/14/12	Wednesday	0.71
3/16/12	Friday	0.79
3/17/12	Saturday	0.12
3/25/12	Sunday	0.47
3/27/12	Tuesday	0.87
3/31/12	Saturday	0.12
4/11/12	Wednesday	0.16
4/12/12	Thursday	0.71
4/13/12	Friday	0.55
4/25/12	Wednesday	0.35
10/22/12	Monday	0.75
10/31/12	Wednesday	0.19
11/1/12	Thursday	0.24
11/16/12	Friday	0.24
11/17/12	Saturday	0.51
11/21/12	Wednesday	0.35
11/28/12	Wednesday	0.4
11/29/12	Thursday	0.11
11/30/12	Friday	0.99
12/1/12	Saturday	0.51
12/2/12	Sunday	1.18
12/5/12	Wednesday	0.31
12/15/12	Saturday	0.16
12/17/12	Monday	0.12
12/21/12	Friday	0.35
12/22/12	Saturday	1.46

12/23/12	Sunday	0.67
12/25/12	Tuesday	0.87
1/5/13	Saturday	0.51
1/6/13	Sunday	0.23
1/23/13	Wednesday	0.16
2/19/13	Tuesday	0.27
3/6/13	Wednesday	0.12
3/19/13	Tuesday	0.16
3/20/13	Wednesday	0.31
3/31/13	Sunday	1.27
4/4/13	Thursday	0.59
5/6/13	Monday	0.11
11/19/13	Tuesday	0.39
11/20/13	Wednesday	0.16
12/6/13	Friday	0.24
1/30/14	Thursday	0.15
2/6/14	Thursday	0.36
2/7/14	Friday	0.12
2/8/14	Saturday	1.02
2/9/14	Sunday	0.47
2/26/14	Wednesday	0.28
2/28/14	Friday	0.63
3/3/14	Monday	0.11
3/5/14	Wednesday	0.36

